

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Jim McLaughlin

Title: Executive Director - Operations

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-1

Does Verizon have logs or other records documenting the time required by its employees to complete all or some of the tasks associated with either the individual hot cut process or the bulk hot cut process? If yes, in what form does Verizon maintain such records (e.g. electronically, on paper)? In addition, please list each task for which completion time is logged. Please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs or records.

REPLY: Please see Verizon MA's reply to ATT 1-32.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: DR William Taylor
Title: Senior VP - NERA

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-3

Please confirm that the calculations included in the Hot Cut Panel Testimony, Exhibit IV-A (proprietary), are based on Verizon's current estimate of the hot cut volumes that Verizon will have to process in each of the four periods to convert the embedded base while keeping up with day-to-day migration activity. Please provide a spreadsheet containing Verizon's estimate of total monthly incremental hot cuts for each of the months. Please populate the spreadsheet utilizing the following heading format:

Month Embedded Base Conversion UNE-P Resale Winback Total

REPLY:

The calculations included in the Hot Cut Panel Testimony, Exhibit IV-A (proprietary), are based on Verizon MA's current estimate of the hot cut volumes that Verizon will have to process in each of the four periods to convert the embedded base while keeping up with day-to-day migration activity.

Please see the attached spreadsheet (MA MCI Attachment 1-3) for Verizon MA's estimate of total monthly incremental hot cuts. The attached spreadsheet is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

Please note, the attachment does not include an estimate for resale because migrations from UNE-P to resale requiring hot cuts are likely to be insignificant. Please see footnote #4 of W. Taylor's testimony for more detail.

VZ # 225

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce Meacham
Title: Group Manager- Service Costs

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-4 With respect to Hot Cut Panel Testimony, Cost Model Exhibit III-A, Tab1, Connect Typical Occurrence, column D:

- (a) What instructions were given to the providers of this Connect Typical Occurrence information?
- (b) Please provide copies of all instructions used in the development of Connect Typical Occurrence data.
- (c) What is the source of the entry for APC activity 1?
- (d) What is the source of the entries for RCMAC activities 1, 2, 3, 5 and 7?

REPLY:

- (a) Appropriate field managers were verbally instructed to provide Connect Typical Occurrence data.
- (b) Since there were no written instructions, no copies are available.
- (c) In D.T.E. 01-20, the Department set the fallout rate for the APC at 2%. Verizon calculated the 2% fallout rate by setting the Typical Occurrence Factor at 4% and the Forward Looking Adjustment Factor at 50%.

ITEM: MCI 1-4
Reply cont'd

- (d) The entries for RCMAC activities 1, 2, 3, 5 and 7 are the same entries approved by the Department for basic hot cuts in D.T.E. 01-20.

VZ # 226

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Livecchi

Title: Director – Network Engineering

REQUEST: WorldCom, Inc. (“MCI”), Set #1

DATED: December 30, 2003

ITEM: MCI 1-5 What percentage of Verizon's total working loops in
Massachusetts are equipped with NGDLC technology?

REPLY: Please see Verizon MA’s reply to Joint Parties 1-9b.

VZ # 227

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Maryellen Langstine

Title: Director - Wholesale

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-7 Please provide copies of all Verizon materials, documents or job aids, describing methods and procedures related to the performance of individual or bulk hot cuts and associated number portability, including, but not limited to materials provided to Verizon personnel in the RCCC and RCMAC.

REPLY: Please see the attached file. The attached file is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order. In addition, the attachment is voluminous, and accordingly, a copy is being provided only to the Department and MCI. A copy of this file was previously provided to AT&T in response to ATT 1-39. A copy will be made available for review by other parties at Verizon MA's offices.

Attached are the following Methods and Procedures:

- RCCC - 2 Wire Analog Loop HOT CUT Including LNP, RCO 99-1014
- RCCC - 2 Wire Analog Hot Cut including IDLC, RCO 02-4069
- RCCC - Large Job Project Hot Cut Process, RCO 00-2083,
- RCMAC Flash - LNP & INP HOT CUTS & UNE COORDINATED CUTS
- Frame - Network Operation Information Letter ("NOIL") 0005-005 for Large Job Hot Cut Frame Process

Verizon MA is continuing to search for responsive documents, and, if further responsive documents are identified, will make them available in a supplemental response.

VZ # 229

**Verizon New England Inc.
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Docket No. 03-60

Respondent: Jim McLaughlin
Title: Executive Director - Operations

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-8 Please state the maximum number of additional employees per month that Verizon will need to dedicate to the hot cut process, based on the Verizon FLM analysis.

REPLY: Please see Verizon MA's Initial Panel Testimony (Hot Cuts), dated November 14, 2003, at Exhibit IV A, pages 58-62.

VZ # 230

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Bruce Meacham

Title: Group Manager – Service Costs

REQUEST: WorldCom, Inc. (“MCI”), Set #1

DATED: December 30, 2003

ITEM: MCI 1-9 With respect to the Hot Cut Panel Testimony, Cost Model Exhibit III-A, Tab1, Connect Time, column C:

- (a) what instructions were given to the providers of the Connect Time information?
- (b) please provide copies of all instructions used in the development of Connect Times.
- (c) was averaging a part of the Connect Time information development?
- (d) what controls were applied to the development of the Connect Time to insure accuracy?

REPLY:

- (a) Please see Verizon MA’s reply to Conversent Information Request 6-22(iii).
- (b) Please see response to (a) above.
- (c) Please see Verizon MA’s Initial Panel Testimony (Hot Cuts) at III.B.3.c.
- (d) Please see Verizon MA’s Initial Panel Testimony (Hot Cuts) at III.B.3.c and III.B.6.

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Docket No. 03-60

Respondent: Bruce Meacham
Title: Group Manager – Service Cost

REQUEST: WorldCom, Inc. (“MCI”), Set #1

DATED: December 30, 2003

ITEM: MCI 1-10 On page 51, lines 13-15 of the initial Panel testimony on Hot Cuts, the panel states that “substantial efforts were made to convey the importance of the process and the need for unbiased employee response.” Please provide copies of all correspondence, emails, training manuals, notes or any other documentation provided by Verizon’s “Service Cost staff” as part of these efforts.

REPLY: Please see Verizon MA’s reply to Conversent Information Request 6-22(iii).

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Docket No. 03-60

Respondent: Jim McLaughlin
Title: Executive Director - Operations

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-11 Please state the forecasted number of additional employees that Verizon will need, based on the FLM analysis, to handle UNE-L migrations after conversion of the embedded base of UNE-P customers.

REPLY: Please see Verizon MA's Initial Panel Testimony (Hot Cuts), dated November 14, 2003, at Exhibit IV A, pages 58-62.

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Respondent: Jim McLaughlin

Title: Executive Director - Operations

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-13 Referring to page 72 of the Initial Panel testimony, given the time required to offer jobs internally before adding new hires, what is the average time that it would take to net one additional employee?

REPLY: The average time to add employees is approximately 60 days.

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Docket No. 03-60

Respondent: Bruce Meacham

Title: Group Manager – Service Costs

REQUEST: WorldCom, Inc. (“MCI”), Set #1

DATED: December 30, 2003

ITEM: MCI 1-14 Referring to Exhibit III-A, please confirm that the sources for the times, occurrence percentage, and forward looking adjustments represent information specific to Massachusetts, and that all raw time and percentage occurrence survey input data is limited to data collected from employees in Massachusetts. If not, please provide the data sources utilized.

REPLY: The work time estimates, occurrence percentages, and forward looking adjustments contained in Verizon MA’s NRC Model are provided by respondents from offices serving the entire region, as well as from local work centers that generally are not Massachusetts-specific. They are meant to represent work time averages that apply over a multi-state area. Verizon MA makes the non-recurring costs representative of Massachusetts by using labor rates specific to the work that is performed in Massachusetts. For example, for the Massachusetts filing, the Massachusetts CO Frame labor rate was used for the Massachusetts cross-wiring costs.